August 25, 2003

Mr. Mark Ehrman, P.E.,
Former United # 6225
5000 West 86th Street
Indianapolis, Indiana 46268

Re: Exemption 097-17798-00508

Dear Mr. Ehrman:

The application from Former United # 6225, received on August 5, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following equipment for soil and groundwater remediation project located at 9067 Pendleton Pike, Indianapolis, Indiana 46236 is classified as exempt from air pollution permit requirements:

(a) Liquid Ring Pump: Pump has a stack 15 feet above ground level and a diameter of 0.5 feet. The pump has a gas flow rate 700 scfm.

(b) Air Stripper: Pump has a stack 15 feet above ground level and a diameter of 0.67 feet. The pump has a gas flow rate 300 scfm.

Pursuant to 326 IAC 2-1.1-3 (d)(1)(H), sources emitting less than five (5) tons per year of Volatile Organic Compounds (VOCs) and also less than one (1) ton per year of a single hazardous air pollutant (HAP) or two and five-tenths (2.5) tons per year of any combination of HAPs listed pursuant to section 112(b) of the CAA are exempt from the registration and permitting requirements of 326 IAC 2.

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

This exemption is the first air approval issued to this source. The source may operate according to 326 IAC 2-1.1-3. An application or notification shall be submitted in accordance with 326 IAC 2, to the Indiana Department of Environmental Management, Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES), if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Keshav Reddy at (317) 327-2221 or kreddy@indygov.org.

Sincerely,

Originally Signed by

John B. Chavez

KR
cc: File
Air Compliance, Matt Mosier
OAQ, Mindy Hahn
Permits, Keshav Reddy

Indiana Department of Environmental Management
Office of Air Quality

And

City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: **Former United # 6225**
Source Location: **9067 Pendleton Pike, Indianapolis IN 46236**
County: **Marion**
SIC Code: **4959**
Operation Permit No.: **097-17798-00508**
Permit Reviewer: **Keshav Reddy**

The City of Indianapolis Office of Environmental Services (OES) and the Office of Air Quality (OAQ), have reviewed an application for an exemption, Former United # 6225 for a soil and groundwater remediation project to be located at 9067 Pendleton Pike in Indianapolis, Indiana.

The remediation process will involve emissions from oil ring pump and transfer pump. The emission from these equipment will contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). However, through the application process for this remediation, Former United # 6225 has submitted justification that the remediation actives do not meet the criteria for air permit and thus, should receive an exemption.

This remediation project will be reviewed/permitted as an exemption.

Proposed Emission Unit

The source consists of the following process/equipment:

(a) Liquid Ring Pump: Pump has a stack 15 feet above ground level and a diameter of 0.5 feet. The pump has a gas flow rate 700 scfm.

(b) Air Stripper: Pump has a stack 15 feet above ground level and a diameter of 0.67 feet. The pump has a gas flow rate 300 scfm.

Existing Approvals

There are no existing approvals issued to this source.

Stack Summary

Stack ID	Operation	Height	Diameter	Flow Rate	Temperature
Liquid Ring Pump	Ground-water	15	0.5	170	700
Air Stripper	Soil Vapor	15	0.67	300	300

*These emissions do not mix with other stacks.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the Exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 5, 2003. No additional information was received.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution agency".

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO_2	negligible
VOC	2.08
CO	negligible
NO_x	negligible

HAPs	PTE (tons/year)
Benzene	0.06
Toluene	0.00002
Ethyl benzene	0.007
Xylene	0.02
MTBE	0.002
Total HAPs (tons/yr)	0.09

(a) The potential to emit (as defined in 326 IAC 2-7-1 (29)) of the pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

Actual Emissions

No previous emission data has been received from the source to be operated at 9067 Pendleton Pike, Indianapolis, Indiana, 46236.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	N/A
PM10	N/A
SO_2	N/A
VOC	2.08
CO	N/A
NO_x	N/A
Single HAP	0.06
Combination HAPs	0.09

(a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) Each criteria pollutant is less than 100 tons per year,
(b) A single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) Any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source at this location.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review Rules: General Provisions; Applicability) and or 326 IAC 2-5.1 (Construction of New Sources).

326 IAC 2-4.1(HAPs Major Sources; New Source Toxics Control)

The source has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO_x and/or VOC in Marion County and less that one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6 (Particulate Rules)

(a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.

(b) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source

326 IAC 7 (Sulfur Dioxide Rules)

This source does not have any emission unit with the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7 does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

(a) The potential to emit of the liquid ring pump and air stripping emission units and is less than 25 tons per year therefore, 326 IAC 8-1-6 does not apply.

(b) There are no other 326 IAC 8 rules applicable to source.

Conclusion

The soil and groundwater remediation project proposed for 9067 Pendleton Pike, Indianapolis, Indiana 46236 shall be subject to the conditions of the attached exemption number 097-17798-00508.

Appendix A Emissions Calculations

Company Name: Former United # 6225
Address City IN Zip 9067 Pendleton Pike
Permit Number: 097-17798-00508
Reviewer: Keshav Reddy
Date: August 6, 2003

Summary of Emissions from Soil Vapor Extraction

	EU ID	VOC Emissions (Lbs/Hr)	VOC emissions (tons/yr)	HAPs	HAP Emissions Lbs/Hr	HAP Emissions Tons/Yr
	001 & 002	0.4755	2.083			
				Benzene	0.0126	0.055188
Total VOC Emissions			**2.083**	toluene	0.0013	0.005694
				Ethyl Benzene	0.0015	0.00657
				Xylenes	0.0041	0.017958
				MTBE	0.0004	0.001752
				Total HAPs		**0.087**